

# Exhibit A

**From:** [Salcedo, Maria \(SHB\)](#)  
**To:** [Kokalas, Tom](#); [Jacobs, Andrew](#); [Goldman, Rachel](#); [Connolly, Daniel](#); [Jones, Barbara](#)  
**Cc:** [Geoffrey Spaulding](#); [Cummings, Dan \(SHB\)](#); [Cole, Brandon J. \(SHB\)](#); [Lean, Amanda M. \(SHB\)](#); [Potter, Erich C. \(SHB\)](#); [Lewis, Rachel M. \(SHB\)](#); [Shortnacy, Michael \(SHB\)](#); [Hill, Jennifer \(SHB\)](#); [Roopal Luhana](#); [Sarah London](#); [Rachel Abrams](#); [Steven Cohn](#); [Tiffany Ellis](#); [Uber MDL Privilege Log Team](#); [Berg, Arianna R. \(SHB\)](#)  
**Subject:** Submission Deadlines This Week  
**Date:** Wednesday, June 4, 2025 3:32:38 PM  
**Attachments:** [image003.png](#)

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Dear Judge Jones,

Defendants write to request an adjustment of certain upcoming submission deadlines. Defendants are currently analyzing Plaintiffs' revised list of challenges for privilege logs through March 3, which we received yesterday. While that list has narrowed significantly since its initial exchange, there are still 349 challenges remaining, making it the largest submission to date. Defendants are working towards providing any briefing on privilege logs through March 3 by the June 6 deadline.

At the same time, Defendants are tracking three other deadlines on Thursday and Friday of this week:

1. Objections, if any, to the Special Master's determinations for Breeden, Burke, and Lake (part of Protocol A) – Currently due Thursday, June 5
2. Briefing on challenges to privilege logs from March 24 – May 7 – Currently due Friday, June 6
3. Briefing on challenges to privilege logs from May 19 – Currently due Friday, June 6

Each of these three sets requires attorney analysis, factual investigation, conferral with our client, and drafting of briefs and/or declarations in support of our privilege assertions. Defendants respectfully request to extend the three deadlines listed in items 1-3 above by one week. This extension is necessitated, in part, due to the large volume of challenges that remain in Plaintiffs' final list of challenges to privilege logs from March 24 – May 7 (approx. 1131).

We have communicated with Plaintiffs' counsel regarding this request. They informed us that they would not oppose a three-day extension of these deadlines, but Defendants respectfully request that the Special Master extend these deadlines by one week. As the party with the burden of proof, Defendants need the additional time to be able to adequately support our privilege claims, which requires among other things analysis and input from our client.

We thank the Special Master's team for your consideration of this one-week extension.

**Maria R. Salcedo**

*Partner*

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